

10.0 Health and Safety/Training

H&S procedures for Site activities are described in the *Health and Safety Manual* and the *Integrated Safety Management System Description with Embedded Worker Safety and Health Program* (LMS/POL/S04328) and are consistent with DOE orders, regulations, codes, and standards. Additional Site-specific H&S information is provided in Appendix I.

Before performing work activities, the work will be evaluated in accordance with the LMS WPP (Section 9.0) and appropriate H&S documentation will be developed.

10.1 Training

Site personnel will be trained in accordance with LMS Site-specific and position-specific requirements. A training plan will be prepared for each individual outlining the training required. The employee's functional manager and the LMS Site manager will provide input to the individual training plan for each employee who is assigned to the Site. The LMS Training department will notify each employee of the required training, and will track completion of the required classes. Training or qualifications that require periodic update or recertification will be tracked and the individual will be notified that action is required to remain current in the training or qualification.

LMS training, as specified by the Training department, is required for all LMS employees including subcontractors. In addition, all occupants of the Rocky Flats office building that are not classified as visitors must view a Building Indoctrination presentation that includes emergency response information and HAZCOM information. The administrative assistant and H&S specialist will audit the files maintained at Rocky Flats on a semiannual basis to confirm that all required individuals have completed the training. HAZCOM training will be refreshed as necessary due to changes, additions, and/or concerns.

All personnel, subcontractors, and visitors who will have unescorted access to the Site must also complete Site-specific orientation training. This training is available through the LMS Training department. Records of the training will be maintained by the department, with a copy maintained at the Rocky Flats office. The administrative assistant and H&S specialist will audit the files maintained at Rocky Flats on a semiannual basis to determine that all required individuals have completed the orientation.

Read-and-sign training is also required for ALL individuals who will enter the Site or the Rocky Flats office. The read-and-sign training records are maintained by the Site's H&S specialist.

Project safety meetings will be held on a periodic basis for Site personnel and a training roster will be completed to document attendance. The rosters will be maintained in the Rocky Flats office. In addition, personnel will receive safety information at weekly staff meetings conducted by their assigned functional organization.

Occupational Safety and Health Administration (OSHA) training (OSHA 29 CFR 1910.120) ("HAZWOPER" training), included by reference in 10 CFR 850 is not applicable for routine activities at the Site. HAZWOPER training is recommended for personnel who routinely work on Site because much of the subject matter and practical factors are generally relevant to the

types of field work performed. First aid/cardiopulmonary resuscitation (CPR) training is required for all personnel who routinely perform work at or who routinely visit the Site.

Note that evaluation of specific training for activities is a component of the LMS WPP, through the completion of the Project/Activity Evaluation, form DOE-LM 1005e. See Section 9.0 and Appendix H.

10.2 HAZCOM

The purpose of HAZCOM is to ensure that hazards at a site are communicated to all personnel according to 29 CFR 1910.1200 and 1926.59. A written HAZCOM program is included in the *Health and Safety Manual* (Standard 5.3) and includes the following:

- Container Labeling—Personnel will ensure that all containers (both primary and secondary) are labeled according to contents. These labels can be provided by the manufacturers or produced by Site personnel. All labels will be checked for identity and hazard warning and should generally conform to the requirements of 29 CFR 1910.1200.
- Chemical List—A chemical list will be maintained by the H&S specialist and on the RF-Share drive that includes any hazardous chemical used at the Site and/or office.
- Material Safety Data Sheets (MSDSs)—There will be an MSDS for each hazardous chemical used at the Site and/or office. MSDSs will be located at the Site office and will be kept with the master chemical list. MSDSs for Site projects will be kept on Site, as well as in the office, for the duration of the project.
- Employee Information Training—Information about specific chemical hazards is communicated through a pre-evolution briefing or periodic safety meetings. Employees will be briefed anytime a new hazardous chemical is introduced on the Site.

Personnel whose job functions include using chemicals will consult the *Rocky Flats Site Chemical Management Plan* (CMP) (Attachment F3) for the procurement, handling, storage, spill response, and disposal of the hazardous chemicals. Many chemical products used in routine office activities must also be tracked and managed as chemicals in accordance with the CMP. The CMP can be found on the RF-Share drive.

10.3 Sample Handling

Samples will be collected, identified, handled, and transported according to the SAP which includes the following:

- Personal Protective Equipment (PPE)—Field personnel will wear the PPE that is identified in the applicable JSAs. Consumables will not be allowed where sample collection and preparation activities are performed.
- Sample Collection—Samples will be collected by the methods described in the SAP using certified sample containers. Reusable sample containers will be decontaminated before being transported and will be preserved according to the SAP. See Section 8.4 for additional information.
- Sample Identification—Each sample will be assigned a unique identifier that will correspond to the sample time, date, and sampling location. Custody of the sample will be

maintained in accordance with procedure GT-3 (P), “Standard Practice for Chain-of-Custody Control and Physical Security of Samples,” of the *Environmental Procedures Catalog* (LMS/POL/S04325). See Section 8.4 for additional information.

- **Transportation**—Based on process knowledge, including analytical results since closure, samples are not U.S. Department of Transportation (DOT) hazardous materials, nor are they regulated by DOT or the International Air Transportation Association (IATA) regulations. In addition, samples are not DOE-regulated radiological materials. This evaluation has been performed using process knowledge for the environmental samples normally collected under the current sampling program; this evaluation must be reviewed annually with the results documented in the Rocky Flats project file. Samples must be packaged and labeled in accordance with BMPs to ensure they arrive at their destination intact and not compromised for analysis. The packaging and shipping procedures recommended by the normal carriers (e.g., UPS, FedEx, and DHL) are used for transportation. H&S personnel must review release evaluations for new sampling locations and historical sampling locations when conditions of samples or locations indicate conditions may have changed. See Section 13.10 for additional information.
- **Excess Sample Disposition**—Excess sample water will be disposed of in accordance with directive number RF-2006-03 of the SAP.

Supplemental Site-specific information for sample management is included in the Rocky Flats Sample Preparation Room Procedures (Appendix G).

10.4 Periodic Safety Inspections and Evaluation of Potential VOC Exposure for Sampling Activities

Periodic, routine facility health and safety inspections are conducted and documented in accordance with this RFSOG. Monthly inspections of the Dover Street office and the Site are conducted by the Rocky Flats technical staff. Focused inspections of items listed on form LMS 2114e, Routine Health and Safety Inspection Checklist, are rotated to ensure that a comprehensive picture of general workplace safety is achieved. Staff are assigned a month to perform either the Site or office inspection; both inspections are performed monthly.

Once inspections are complete, the forms are submitted to the H&S specialist, who reviews any concerns or comments. Issues to be resolved are noted and either immediately remedied or assigned a date for completion and compliance. The LMS Site manager then reviews the inspection checklist prior to its delivery to the LMS H&S Workbox email address. The inspection checklists can be found on the LM Portal, Health and Safety page.

Potential VOC exposure is evaluated during sampling activities. VOCs are one of several contaminants of interest at the Site and have resulted from decades of production-related activities including waste storage, disposal practices that were acceptable at the time, spills, and leaks. Because of the potential for VOCs, industrial hygiene air monitoring (e.g., using a photoionization detector) will be performed at select water monitoring locations, including wellheads where VOC concentrations are suspected. Refer to the H&S folder on the RF-Share drive for information on industrial hygiene air monitoring.

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